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ANNUAL AUDITED REPORT Processing **FORM X-17A-5 PART III**

Section FEB 27 2019

SEC

SEC FILE NUMBER 8-66973

FACING PAGE

Washington DC

Information Required of Brokers and Dealers Pursuant to Section 17 of the Securities Exchange Act of 1934 and Rule 17a-5 Thereunder

REPORT FOR THE PERIOD BEGINNING 01/01/18 AND EI		_{DING} 12/31/18			
	MM/	/DD/YY		MM/DI	D/YY
A	A. REGISTRANT I	DENTIFICATION			
NAME OF BROKER-DEALER: Str	aus Capital, LLC		F	OFFICI	AL USE ONLY
ADDRESS OF PRINCIPAL PLACE (OF BUSINESS: (Do no	ot use P.O. Box No.)		FIF	RM I.D. NO.
50 Princeton-Hightstown R	load, Suite J				
	(No. a	nd Street)			
Princeton Ju	unction	New Jersey	03	8550	
(City)		(State)	(Zip C	Code)	
NAME AND TELEPHONE NUMBER Mr. James Straus	R OF PERSON TO CO	NTACT IN REGARD TO		T 609-799-03	390
			(Are	ea Code –	Telephone Number
В	. ACCOUNTANT	IDENTIFICATION			
DANGER FOR THE PURPLE A COOLDAY	EANE 1	to in a disable Domont	*		
INDEPENDENT PUBLIC ACCOUNT			•		
Mercadien, P.C., Certified I					
	,	ual, state last, first, middle nan			00540 7640
P.O. Box 7648	Prince	ton	New Jer	sey	08543-7648
(Address)	(City)		(State)		(Zip Code)
CHECK ONE:					
	ntant				
CHECK ONE: Certified Public Account Public Account Account Public Account Acc	ntant				
		y of its possessions.			

*Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See Section 240.17a-5(e)(2)

OATH OR AFFIRMATION

I, James Straus	, swear (or affirm) that, to the best of
my knowledge and belief the accompanying financial Straus Capital, LLC	al statement and supporting schedules pertaining to the firm of, as
of December 31	20_18, are true and correct. I further swear (or affirm) that
neither the company nor any partner, proprietor, pr classified solely as that of a customer, except as foll	incipal officer or director has any proprietary interest in any account ows:
	Signature President and CED
Notary Public This report ** contains (check all applicable boxes) (a) Facing Page. (b) Statement of Financial Condition. (c) Statement of Income (Loss).	PAULA A. PULITI-MAXWELL NOTARY PUBLIC OF NEW JERSEY
(d) Statement of Changes in Financial Condition (e) Statement of Changes in Stockholders' Equ (f) Statement of Changes in Liabilities Subord (g) Computation of Net Capital. (h) Computation for Determination of Reserve (i) Information Relating to the Possession or Condition (j) A Reconciliation, including appropriate exp	ity or Partners' or Sole Proprietors' Capital. inated to Claims of Creditors. Requirements Pursuant to Rule 15c3-3.
 (k) A Reconciliation between the audited and u consolidation. ✓ (1) An Oath or Affirmation. ✓ (m) A copy of the SIPC Supplemental Report. 	es found to exist or found to have existed since the date of the previous audit

REPORTS PURSUANT TO RULE 17a-5(d) OF THE SECURITIES AND EXCHANGE COMMISSION

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REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Members of Straus Capital, LLC

Opinion on the Financial Statements

We have audited the accompanying statement of financial condition of Straus Capital, LLC (the "Company") as of December 31, 2018, and the related statements of operations, changes in members' equity and cash flows for the year then ended, and the related notes to the financial statements (collectively, the "financial statements"). In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the Company as of December 31, 2018, and the results of its operations and its cash flows for the year then ended in conformity with accounting principles generally accepted in the United States of America.

Basis for Opinion

These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on the Company's financial statements based on our audit. We are a public accounting firm registered with the Public Company Accounting Oversight Board (United States) (PCAOB) and are required to be independent with respect to the Company in accordance with U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

We conducted our audit in accordance with the standards of the PCAOB. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement, whether due to error or fraud. The Company is not required to have, nor were we engaged to perform, an audit of its internal control over financial reporting. As part of our audit we are required to obtain an understanding of internal control over financial reporting but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control over financial reporting. Accordingly, we express no such opinion.

Our audit included performing procedures to assess the risks of material misstatement of the financial statements, whether due to error or fraud, and performing procedures that respond to those risks. Such procedures included examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements. Our audit also included evaluating the accounting principles used and significant estimates made by management, as well as evaluating the overall presentation of the financial statements. We believe that our audit provides a reasonable basis for our opinion.

Supplementary Information

The supplementary information contained in the Computation of Net Capital Pursuant to Uniform Net Capital Rule 15c3-1 (the "Supplemental Information") has been subjected to audit procedures performed in conjunction with the audit of the Company's financial statements. The Supplemental Information is the responsibility of the Company's management. Our audit procedures included determining whether the Supplemental Information reconciles to the financial statements or the underlying accounting and other records, as applicable, and performing procedures to test the completeness and accuracy of the information presented in the Supplemental Information. In forming our opinion on the Supplemental Information, we evaluated whether the Supplemental Information, including its form and content, is presented in conformity with 17 C.F.R. § 240.17a-5. In our opinion, the supplementary information contained in the Computation of Net Capital Pursuant to Uniform Net Capital Rule 15c3-1 is fairly stated, in all material respects, in relation to the financial statements as a whole.

Mercadien, P.C. Certified Public Accountants

We have served as the Company's auditor since 2008.

Hamilton, NJ

February 13, 2019

STATEMENT OF FINANCIAL CONDITION

DECEMBER 31, 2018

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Accounts re-		\$ 624,539 152,601 1,561 2,702
TOTAL A	SSETS	 781,403
	LIABILITIES AND MEMBERS' EQUITY	
LIABILITIES Accrued exp		\$ 33,771
MEMBERS'	EQUITY	 747,632
TOTAL L	IABILITIES AND MEMBERS' EQUITY	\$ 781,403

STATEMENT OF OPERATIONS

REVENUE Commissions Interest Income TOTAL REVENUE	\$	786,838 1,171 788,009
OPERATING EXPENSES		
Commissions		123,896
Professional fees		22,720
Licensing and regulatory expenses		5,348
Office supplies and expenses		2,269
Communication and computer services		13,746
Rent		5,722
Insurance		576
Travel and entertainment		3,641
Miscellaneous		976_
TOTAL OPERATING EXPENSES		178,894
NET INCOME	<u>\$</u>	609,115

STATEMENT OF CHANGES IN MEMBERS' EQUITY

Members' equity - January 1, 2018	\$ 798,724
Capital Withdrawals	(660,207)
Net Income	609,115
Members' equity - December 31, 2018	\$ 747,632

STATEMENT OF CASH FLOWS

CASH FLOWS FROM OPERATING ACTIVITIES		
Net income		\$ 609,115
Adjustments to reconcile net income to net cash from operating activities:		
Changes in operating assets:	A 00.540	
Accounts receivable Changes in operating liabilities:	\$ 89,548	
Accrued expenses	(3,945)	
TOTAL ADJUSTMENTS		85,603
NET CASH FROM OPERATING ACTIVITIES		694,718
CASH FLOWS FROM FINANCING ACTIVITIES		
Capital withdrawals	(660,207)	
NET CASH FROM FINANCING ACTIVITIES		(660,207)
NET CHANGE IN CASH		34,511
CASH AT BEGINNING OF YEAR		590,028
CASH AT END OF YEAR		\$ 624,539

A. BUSINESS AND SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Nature of Organization

Straus Capital, LLC (the "Company") is a broker-dealer registered with the Securities and Exchange Commission (the "SEC") and the State Securities Commission of New Jersey, and is a member of the Financial Industry Regulatory Authority ("FINRA"). The Company was formed as a limited liability company on April 26, 2005, and received approval from the SEC to commence operations on November 28, 2005. The Company solicits and refers investors to managed investment funds and receives a percentage of the investment funds' management and advisory fees for its services.

Basis of Accounting

The financial statements of the Company have been prepared on the accrual basis of accounting in accordance with accounting principles generally accepted in the United States of America ("U.S. GAAP").

Use of Estimates

The preparation of financial statements in conformity with U.S. GAAP requires the Company to make estimates and assumptions that affect certain related amounts and disclosures. Accordingly, actual results could differ from those estimates.

15c3-3 Exemption

The Company claims exemption from the provisions of rule 15c3-3 pursuant to Footnote 74 of SEC Release 34-70073 which states that under circumstances in which a broker-dealer has not held customer securities or funds during the fiscal year, but does not fit into one of the exemptive provisions under item 24 of Part IIA, then those broker-dealers should file an exemption report and related accountant's report even though there is no related box to check on the FOCUS Report. Broker/dealers operating under the provisions of Footnote 74 of SEC Release 34-70073 should also be exempt from the remaining provisions of rule 15c3-3, including the requirement to make the reserve computations under rule 15c3-3.

Cash and Cash Equivalents

For purposes of reporting the statement of cash flows, the Company considers all highly liquid instruments with original maturities of ninety days or less to be cash equivalents.

Accounts Receivable

The Company considers all accounts receivable to be fully collectible; accordingly, no allowance for doubtful amounts is required. If amounts become uncollectible, they will be charged to net income when that determination is made.

Revenue Recognition

The Company solicits and refers investors to managed investment funds and receives a percentage of the investment funds' management and advisory fees for its services. Revenue is recognized when earned by the investment funds.

A. BUSINESS AND SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

Income Taxes

The Company is a limited liability company for federal and state income tax purposes; thus, the income is taxed to its members.

Management evaluated the Company's tax positions as of and for the year ended December 31, 2018, and has determined that there is no liability for uncertain tax positions at December 31, 2018.

The Company did not record any interest or penalties on uncertain tax positions in the accompanying statement of financial condition as of December 31, 2018, or in the accompanying statement of operations for the year then ended. If the Company were to incur any income tax liability in the future, interest on any income tax liability would be reported as interest expense and penalties on any income tax liability would be reported as income taxes.

Recently Adopted Accounting Pronouncement

In May 2014, the Financial Accounting Standards Board ("FASB") issued ASU 2014-09, Revenue from Contracts with Customers (Topic 606), requiring an entity to recognize the amount of revenue to which it expects to be entitled for the transfer of promised goods or services to customers. The updated standard will replace most existing revenue recognition guidance in U.S. GAAP when it becomes effective and permits the use of either a full retrospective or retrospective with cumulative effect transition method. In August 2015, the FASB issued ASU 2015-14, Revenue from Contracts with Customers (Topic 606) – Deferral of the Effective Date, which defers the effective date of ASU 2014-09 by one year. The Company adopted the standard effective for year ended December 31, 2018, and elected the modified retrospective method. The adoption of the standard did not have a material impact on the Company's financial statements or its revenue recognition policies for the current or prior years.

Recent Accounting Pronouncement

In February 2016, the FASB issued ASU 2016-02, *Leases (Topic 842)*, requiring an entity (lessee) that leases assets for a term exceeding a one-year period to recognize a right-of-use asset and corresponding lease liability on the balance sheet. ASU 2016-02 will result in lessees recognizing right-of-use assets and lease liabilities for most leases currently accounted for as operating leases under the legacy lease accounting guidance. ASU 2016-02 introduces limited changes to the lessor accounting model, none of which rise to the same level of significance as the changes made to the lessee accounting model. ASU 2016-02 also requires entities to disclose in the footnotes to their financial statements information about the amount, timing and uncertainty for the payments they make for lease agreements. ASU 2016-02 will be effective for the Company for the year ending December 31, 2020. The Company is currently evaluating the effect that the new standard will have on its financial statements and related disclosures.

A. BUSINESS AND SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

Subsequent Events

Management has evaluated subsequent events that occurred after the statement of financial condition date and through February 13, 2019, the date the financial statements were available to be issued. No items were determined by management to require disclosure in these financial statements.

B. NET CAPITAL REQUIREMENTS

The Company is a registered broker-dealer subject to the SEC Uniform Net Capital Rule 15c3-1. This rule requires that the Company maintain minimum net capital, as defined, of at least the greater of \$5,000 or 6 2/3% of aggregate indebtedness, as defined. Net capital and aggregate indebtedness change from day to day, but as of December 31, 2018, the Company had net capital of \$603,184, which exceeded its requirements of \$5,000 by \$598,184.

C. CONCENTRATION OF CREDIT RISK AND MAJOR CUSTOMER

The Company maintains cash in bank balances that at times may exceed federally insured limits. The Company reduces its exposure to credit risk for cash by maintaining its banking relationship with a major financial institution.

Five investment fund manager groups account for all of the Company's commission revenues.

D. LEASE COMMITMENT

The Company leases its office space under an operating lease. Rental expense for the year ended December 31, 2018, was \$5,722.

Future minimum lease payments under the lease are as follows:

Years ending December 31,	
2019	\$ 6,328
2020	6,328
2021	 5,274
Total	\$ 17,930

SUPPLEMENTARY INFORMATION

)..

COMPUTATION OF NET CAPITAL PURSUANT TO **UNIFORM NET CAPITAL RULE 15c3-1**

AS OF DECEMBER 31, 2018

CREDITS Members' equity		\$ 747,632
DEBITS Accounts receivable, net of commission payable FINRA daily account Prepaid expenses	\$ 140,185 1,561 2,702	
		144,448
NET CAPITAL		603,184
Minimum net capital requirement		5,000
EXCESS NET CAPITAL		\$ 598,184
AGGREGATE INDEBTEDNESS Accrued expenses and other liabilities		\$ 21,355

Ratio of aggregate indebtedness to net capital .04 to 1

STATEMENT PURSUANT TO PARAGRAPH (d)(2) of RULE 17a-5

There are no material differences between the above computation and the computation included in the Company's corresponding unaudited Form X-17A-5 Part IIA filing.

STATEMENT PURSUANT TO PARAGRAPH (d)(4) of RULE 17a-5

The Company claims an exemption from SEC Rule 15c3-3 as the Company had no obligations under 17 C.F.R. §240.15c3-3, and therefore, no computation for determination of reserve requirements was necessary.

See the accompanying Report of Independent Registered Public Accounting Firm

EXEMPTION REPORTS



REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Members of Straus Capital, LLC

We have reviewed management's statements included in the accompanying Exemption Report Pursuant to Rule 17a-5(d)(4), in which (a) Straus Capital, LLC (the "Company") states that it may file an exemption report because it had no obligations under 17 C.F.R. § 240.15c3-3, and (b) the Company stated that the Company had no obligations under 17 C.F.R. § 240.15c3-3 throughout the most recent fiscal year without exception. The Company's management is responsible for compliance with the exemption provisions and its statements.

Our review was conducted in accordance with the standards of the Public Company Accounting Oversight Board (United States) and, accordingly, included inquiries and other required procedures to obtain evidence about the Company's compliance with the exemption provisions. A review is substantially less in scope than an examination, the objective of which is the expression of an opinion on management's statements. Accordingly, we do not express such an opinion.

Based on our review, we are not aware of any material modifications that should be made to management's statements referred to above for them to be fairly stated, in all material respects, based on the provisions set forth in paragraph 17 C.F.R. § 240.15c3-3.

Mercadien, P.C. Cextified Public Accountants

February 13, 2019

EXEMPTION REPORT PURSANT TO RULE 17a-5(d)(4)

FOR THE YEAR ENDED DECEMBER 31, 2018

Straus Capital, LLC (the "Company") is a registered broker-dealer subject to Rule 17a-5 promulgated by the Securities and Exchange Commission (17 C.F.R. §240.17a-5, "Reports to be made by certain brokers and dealers"). This Exemption Report was prepared as required by 17 C.F.R. §240.17a-5(d)(1) and (4). To the best of its knowledge and belief, the Company states the following:

- (1) The Company may file an exemption report because the Company had no obligations under 17 C.F.R. §240.15c3-3
- (2) The Company had no obligations under 17 C.F.R. §240.15c3-3 throughout the most recent fiscal year without exception

I, James Straus, swear (or affirm) that, to my best knowledge and belief, this Exemption Report is true and correct.

By. Course to Man

Title: President and LED

Date: 2/22/19

Independent Accountants' Report on Applying Agreed-Upon Procedures Related to the Securities Investor Protection Corporation ("SIPC") Rule 17a-5(e)(4)



SEC
Mail Processing
Section
FEB 27 2019
Washington DC
408

STRAUS CAPITAL, LLC

Independent Accountants' Report on Applying Agreed-Upon Procedures Related to the Securities Investor Protection Corporation ("SIPC") Rule 17a-5(e)(4)

This report is deemed CONFIDENTIAL in accordance with Rule 17a-5(e)(3) under the Securities Exchange Act of 1934.

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GENERAL ASSESSMENT RECONCILIATION (FORM SIPC-7)	3



INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

To the Members of Straus Capital, LLC

In accordance with Rule 17a-5(e)(4) under the Securities Exchange Act of 1934 and with the SIPC Series 600 Rules, we have performed the procedures enumerated below which were agreed to by Straus Capital, LLC (the "Company") and the Securities Investor Protection Corporation ("SIPC") with respect to the accompanying General Assessment Reconciliation ("Form SIPC-7") of the Company for the year ended December 31, 2018, solely to assist you and SIPC in evaluating the Company's compliance with the applicable instructions of Form SIPC-7. The Company's management is responsible for the Company's compliance with those requirements. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the Public Company Accounting Oversight Board (United States) and the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose. The procedures we performed and our findings are as follows:

- 1. Compared the listed assessment payments in Form SIPC-7 with respective cash disbursement record entries as reflected in the Company's QuickBooks general ledger and as vouched to the underlying bank statement, noting no differences.
- 2. Compared the amounts reported on the audited Form X-17A-5 (FOCUS Report) for the year ended December 31, 2018, as applicable, with the amounts reported in Form SIPC-7 for the year ended December 31, 2018, noting no differences.
- 3. Compared any adjustments reported in Form SIPC-7 with supporting schedules and working papers, noting no differences.
- 4. Proved the mathematical accuracy of the calculations reflected in Form SIPC-7 and in the related schedules and working papers supporting the adjustments, noting no differences.
- 5. Compared the amount of any overpayment applied with Form SIPC-7 on which it was computed, noting no differences. There were no overpayments applied on Form SIPC-7.

INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES (CONTINUED)

We were not engaged to, and did not, conduct an examination, the objective of which would be the expression of an opinion on compliance. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the specified parties listed above, and is not intended to be, and should not be, used by anyone other than these specified parties.

Mercadien, P.C. Certified Public Accountants

Hamilton, NJ February 13, 2019

SIPG-7

(36-REV 12/18)

SECURITIES INVESTOR PROTECTION CORPORATION P.O. Box 92185 Washington, D.C. 20090-2185 202-371-8300

General Assessment Reconciliation

SIPC-7 (36-REV 12/18)

For the fiscal year ended 12/31/2018 (Read carefully the instructions in your Warking Copy before completing this Form)

TO BE FILED BY ALL SIPC MEMBERS WITH FISCAL YEAR ENDINGS

8°8***********************************		Note: If any or the information shown on the mailing label requires correction, please e-maany corrections to form@sipc.org and so indicate on the form filed.	
PRINCETON JUNCTION, NJ 08550-1107		Name and telephone number of person to contact respecting this form.	
- Committee management		STUART AMELSON 604-933-30	
A. General Assessment (item 2e from page 2)	with the second section of the section of the second section of the second section of the section of the second section of the secti	ş /.182	
•	43	540	
B. Less payment made with SIPC-6 filed (exclude inte	rest;		
C Less prior overpayment applied			
D. Assessment balance due or (overpayment)		642	
E. Interest computed on late payment (see instruction	on E) fordays a		
F. Total assessment balance and interest due (or overpayment carried forward)		rward) s 642	
G. PAYMENT: √ the box Check mailed to P.O. Box W Funds Wired J	ACH 🖸		
Total (must be same as F above)	\$	642	
H. Overpayment carried forward	\$ <u>.</u> \$(Procure des la MANTE de la Constitución de la Const	
	\$ <u>.</u> \$(Procure des la MANTE de la Constitución de la Const	
H. Overpayment carried forward	\$ <u>.</u> \$(THE CONTRACT OF A PARAMETER AND A SECURE AND	
H. Overpayment carried forward Subsidiaries (S) and predecessors (P) included in this re SIPC member submitting this form and the arson by whom it is executed represent thereby at all information contained herein is true, correct	\$	1 1934 Act registration number); IS CAPITAL LLC	
H. Overpayment carried forward Subsidiaries (S) and predecessors (P) included in this is SIPC member submitting this form and the arson by whom it is executed represent thereby at all information contained herein is true, correct indicamplete. It is form and the assessment payment is due 60 days a period of not less than 6 years, the latest 2 year	S:S:S:	S CAPITAL LLC More of Syporation Parties from the Capenzation Author and Signal to: 49 the Guld and CEO (Tide) et siscal year. Retain the Working Copy of this form	
H. Overpayment carried forward Subsidiaries (S) and predecessors (P) included in this is SIPC member submitting this form and the circum by whom it is executed represent thereby at all information contained herain is true, correct indicomplete. Ited the 13 day of Fchampo 19. Its form and the assessment payment is due 60 days or a period of not less than 6 years, the latest 2 year. Dates: Postmarked Received Received	\$s:s:s:s:s:s:s:s:s:	I 1934 Act registration number): IS CAPITAL LLC More at Opporation Physical action accentration Authorized Signal (a): 45 (Curt and CEO (Title) et fiscal year. Retain the Working Copy of this form sible place.	

DETERMINATION OF "SIPC NET OPERATING REVENUES" AND GENERAL ASSESSMENT

STRAUS CAPITAL LLC

Amounts for the fiscal period beginning 1/1/2018 and ending 12/31/2018

Item No. 2a. Total revenue (FOCUS Line 12/Part IIÁ Line 9, Code 4030)	\$ 788,009
2b. Additions:	
(1) Total revenues from the securities business of subsidiaries (except foreign subsidiaries) and predecessors not included above.	
(2) Nat loss from principal transactions in securities in trading accounts.	
(3) Net loss from principal transactions in commodities in trading accounts.	
(4) Interest and dividend expense deducted in determining item 2a.	
(5) Net loss from management of or participation in the underwriting or distribution of securities.	
(6) Expenses other than advertising, printing, registration fees and legal fees deducted in determining net profit from management of or participation in underwriting or distribution of securities.	
(7) Net icss from securities in investment accounts.	
Tetal additions	<u>O</u>
2c. Deductions: (1) Revenues from the distribution of shares of a registered open end investment company or unit investment trust, from the sale of variable annuities, from the business of insurance, from investment advisory services rendered to registered investment companies or insurance company separate accounts, and from transactions in security lutures products.	
(2) Revenues from commodity transactions.	***************************************
(3) Commissions, floor brokerage and clearance paid to other SIPC members in connection with securities transactions.	
(4) Reimbursements for postage in connection with proxy solicitation.	
(5) Net gain from securities in investment accounts.	
(6) 100% of commissions and markups earned from transactions in (i) certificates of deposit and (ii) Treasury bills, bankers acceptances or commercial paper that mature nine months or less from issuance date.	
(7) Direct expenses of printing advertising and legal less incurred in connection with other revenue related to the securities business (revenue defined by Section 16(3)(L) of the Act).	
(8) Other revenue not related either directly or indirectly to the securities business. (See Instruction C):	
Deductions in excess of \$100,000 require documentation)	
(9) (i) Total interest and dividend expense (FOCUS Line 22:PART IIA Line 13. Code 4075 plus line 2b(4) above) but not in excess of total interest and dividend income.	
(ii) 40% of margin interest earned on customers securities accounts (40% of FOCUS line 5. Code 3960).	
Enter the greater of line (i) or (ii)	
Total deductions	0
2d. SIPC Net Operating Revenues	s 788,009
2e. General Assessment @ .0015	\$ //182 (to page 1, line 2.A.)